

**IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JOLENE K. YOUNGERS,  
AS PERSONAL REPRESENTATIVE OF THE  
WRONGFUL DEATH ESTATE OF ROXSANA  
HERNANDEZ,**

**Plaintiff,**

**v.**

**1:20-cv-00465 JAP-JHR**

**MANAGEMENT & TRAINING CORPORATION,  
LASALLE CORRECTIONS TRANSPORT LLC,  
LASALLE CORRECTIONS WEST LLC,  
LASALLE MANAGEMENT COMPANY LLC,  
GLOBAL PRECISION SYSTEMS LLC,  
TRANSCOR AMERICA LLC,  
CORRECTIVE, INC,**

**Defendants.**

**GLOBAL PRECISION SYSTEMS, LLC’S MOTION TO DISMISS COUNTS I and II**

DEFENDANT, Global Precision Systems, LLC (“GPS”), through its counsel of record, Madison, Mroz, Steinman, Kenny & Olexy, P.A., (Gregory D. Steinman), pursuant to Fed.R.Civ.P. 12(b)(6), hereby moves the Court to dismiss Counts I and II against it. As grounds for this Motion, GPS states:

1. The Court has dismissed Plaintiff’s Counts I and II pursuant to a Motion filed by Defendants TransCor America, LLC and CoreCivic, Inc.

2. Plaintiff’s allegations against GPS, pursuant to Counts I and II, are identical to those asserted, and dismissed, against TransCor America, LLC and CoreCivic, Inc.

3. To the extent the Court’s Order of April 19, 2021, has not already done so, GPS respectfully requests that the Court dismiss Counts I and II against GPS.

Respectfully submitted,

Madison, Mroz, Steinman,  
Kenny & Olexy, P.A.

By: /s/ Gregory D. Steinman  
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Global Precision Systems, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 5th day of May, 2021, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the notice of electronic filing.

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